

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**IN RE:
BLUE CROSS BLUE SHIELD
ANTITRUST LITIGATION
(MDL NO. 2406)**

Master File No. 2:13-CV-20000-RDP

**This Document Relates to
Provider Track Cases**

**PROVIDER PLAINTIFFS' MOTION FOR APPROVAL OF A PLAN FOR NOTICE
AND APPOINTMENT OF SETTLEMENT NOTICE ADMINISTRATOR AND
SETTLEMENT ADMINISTRATOR**

The Provider Class Representatives¹ (on behalf of themselves and the Settlement Class) (“Provider Plaintiffs”) move this Court for an order directing notice of the proposed Settlement Agreement reached by Provider Plaintiffs and Settling Defendants, and appointing BrownGreer PLC as the Settlement Notice Administrator and Special Master Edgar C. Gentle, III as the Settlement Administrator.

In support of this Motion, Provider Plaintiffs are submitting herewith a Memorandum of Law, the Declaration of Roma Petkauskas (“Petkauskas Declaration”) as Exhibit A, and the Declaration of Shannon R. Wheatman, Ph.D. as Exhibit B. Attached to the Petkauskas Declaration are Ms. Petkauskas’s biography as Exhibit 1 and BrownGreer’s firm resume as Exhibit 2. Attached to the Wheatman Declaration is Dr. Wheatman’s biography as Exhibit A. In addition, this Motion is also supported by the Preliminary Approval Motion, Memorandum of Law in support, and attached exhibits.

¹ Capitalized terms not otherwise defined herein shall have the meaning given them in the Settlement Agreement attached to Provider Plaintiffs’ Motion for Preliminary Approval of Proposed Class Settlement, filed contemporaneously herewith.

For the reasons set forth in these materials, the Provider Plaintiffs' Motion should be granted, and the Court should enter a Preliminary Approval Order in the form proposed by the Provider Plaintiffs in the Preliminary Approval Motion.

Respectfully submitted this the 14th day of October, 2024.

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